

Mark Cantor (admitted *pro hac vice*)  
mcantor@brookskushman.com  
Marc Lorelli (admitted *pro hac vice*)  
mlorelli@brookskushman.com  
**Brooks Kushman P.C.**  
1000 Town Center, 22<sup>nd</sup> Floor  
Southfield, MI 48075  
Tel: (248) 358-4400 – Fax: (248) 358-3351

Gary R. Goodheart  
Nevada Bar # 1203  
grg@jonesvargas.com  
**Jones Vargas**  
3773 Howard Hughes Parkway  
Third Floor South  
Las Vegas, NV 89169  
Tel: (702) 862-3300 – Fax: (702) 737-7705

*Attorneys for Defendant Corea Autoparts  
Producing Corporation d/b/a CAP America*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROBERT BOSCH LLC,  
Plaintiff,

v.

COREA AUTOPARTS PRODUCING  
CORPORATION d/b/a CAP AMERICA,  
Defendant.

Case No. 2:10-cv-01924-RLH-RJJ

**MOTION TO COMPEL DISCOVERY**

[EXPEDITED RELIEF REQUESTED]

Defendant (“CAP America”) moves to compel discovery from plaintiff (“Bosch LLC”).  
More specifically, CAP America requests this Court to order the following:

1. Bosch LLC to produce all requested documents and information in the possession  
of Robert Bosch GmbH;

2. Bosch LLC to identify documents responsive to each of CAP America's production requests;

3. Bosch LLC to provide its doctrine of equivalents infringement position in response to Interrogatory No. 1;

4. Bosch LLC to respond fully to Interrogatory Nos. 3-5, 8 and 9; and

5. Bosch LLC to specify the Rule 33(d) records being relied upon in response to Interrogatory No. 6.

In making this motion, CAP America relies upon the accompanying brief.

Prior to filing this motion, and pursuant to L.R. 26-7, counsel for both CAP America and Bosch LLC communicated by telephone conference and correspondence in an effort to resolve the discovery issues raised by CAP America's counsel. (See Exhibits 1-3 cited in accompanying brief.) Despite these communications, and a sincere effort to resolve any differences, the parties could not resolve their all the discovery issues that are now the issues of the present motion.

Dated: May 11, 2011

Respectfully submitted,

By: /s/ Marc Lorelli

Mark Cantor (admitted *pro hac vice*)

mcantor@brookskushman.com

Marc Lorelli (admitted *pro hac vice*)

mlorelli@brookskushman.com

**Brooks Kushman P.C.**

1000 Town Center, 22nd Floor

Southfield, MI 48075

Tel. (248) 358-4400 – Fax (248) 358-3351

Gary R. Goodheart

Nevada Bar # 1203

grg@jonesvargas.com

**Jones Vargas**

3773 Howard Hughes Parkway

Third Floor South

Las Vegas, NV 89169

Tel: (702) 862-3300 – Fax: (702) 737-7705

*Attorneys for Defendant Corea Autoparts  
Producing Corporation d/b/a CAP America*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on May 11, 2011, I electronically filed the foregoing document with the Clerk of the Court for the District of Nevada using the ECF System which will send notification to the following registered participants of the ECF System as listed on the Court's Notice of Electronic Filing: Jennifer L. Braster, Mark A. Cantor, Vincent C. Ferenbach, Jeffrey S. Ginsberg, Gary R. Goodheart, Mark Hannemann, Michael J. Lennon, Marc Lorelli, Robert S. Roe.

I also certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

I certify that I have mailed by United States Postal Service the documents to be filed Under Seal to the attorneys of record.

By: /s/ Marc Lorelli  
Mark Cantor  
mcantor@brookskushman.com  
Marc Lorelli  
mlorelli@brookskushman.com  
**Brooks Kushman P.C.**  
1000 Town Center, 22<sup>nd</sup> Floor  
Southfield, MI 48075  
Tel. (248) 358-4400; Fax (248) 358-3351

Gary R. Goodheart  
Nevada Bar # 1203  
grg@jonesvargas.com  
**Jones Vargas**  
3773 Howard Hughes Parkway  
Third Floor South  
Las Vegas, NV 89169  
Tel: (702) 862-3300 – Fax: (702) 737-7705

*Attorneys for Defendant Corea Autoparts  
Producing Corporation d/b/a CAP America*